

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE MIDDLE DISTRICT OF PENNSYLVANIA**

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|-----------------------------|---|----------------|
| IN RE: Regina M. Dreher | : | CHAPTER 13 |
| | : | |
| Debtors. | : | 18-03124-MJC |
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| PennyMac Loan Services, LLC | : | |
| | : | |
| Movant, | : | |
| | : | |
| v. | : | 11 U.S.C. §362 |
| | : | |
| Regina M. Dreher and | : | |
| Jack N. Zaharopoulos | : | |
| | : | |
| Respondents | : | |

ANSWER TO MOVANT’S MOTION FOR RELIEF

AND NOW, comes the Debtor, Regina Dreher, by and through her Attorney, Patrick J. Best, of ARM Lawyers, who hereby answers as follows:

1. Admitted.
2. Admitted.
3. Admitted.
4. Admitted in part and denied in part. It is specifically denied that any assignment of mortgage is proper.
5. Admitted.
6. Denied. Debtor’s confirmed Chapter 13 Plan provides for post-petition payments in the amount of \$1,958.75. Once these payments are considered, Debtor’s account is current. As the Chapter 13 Plan is confirmed, requesting payment of these arrears directly would be violative of the Plan and would be in contempt of the Order confirming this Plan.

7. Denied. As stated above, Debtor's confirmed Chapter 13 Plan provides for \$1,958.75 of post-petition payments. Once those payments are considered, Debtor only owes for the month of September – which is not even over yet. Debtor's account is current.

8. Denied. As stated above, Debtor's account is current.

9. Admitted in part and denied in part. It is admitted that Debtor currently owes \$1,450 to the Trustee, but Debtor has made arrangements for this to be paid.

10. Denied. First, Debtor's account is current. Second, any and all attorney's fees for bankruptcy related legal services would be prohibited by Act 6. Third, Movant is in contempt of the Order Confirming Debtor's Chapter 13 Plan.

11. This is a conclusion of law to which no response is required.

WHEREFORE, Debtors respectfully request that this Honorable Court deny Movant's Motion for Relief.

Date: September 18, 2021

/s/ Patrick J. Best
Patrick J. Best, Esq.
ARM Lawyers
18 N. 8th St.
Stroudsburg PA 18360
Counsel for Debtor
Phone: 570-420-7431
Facsimile: 484.544.8625